

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

DEC 17 2014

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

V.

ELIZABETH EUER,

Defendant.

No.

4:14CR402 CEJ/TCM

INDICTMENT

COUNT ONE

The Grand Jury charges:

On or about July 10, 2012, in the Eastern District of Missouri, the defendant,

ELIZABETH EUER,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on Form SSA-821-BK, entitled "Work Activity Report-Employee," did state and represent and cause to be stated and represented that she did not have any employment income or wages when in truth and in fact, as **ELIZABETH EUER**, then well knew, she had self-employment income obtained through the operation of her business, Bounce Back Sports, LLC, as early as December 8, 2010.

In violation of Title 18, United States Code, Section 1001.

COUNT TWO

The Grand Jury further charges:

On or about July 10, 2012, in the Eastern District of Missouri, the defendant,

ELIZABETH EUER,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on Form SSA-454-BK, entitled "Continuing Disability Review Report," did state and represent and cause to be stated and represented that due to her physical impairments and limited ability to concentrate her daily activities consisted of self-care, watching television, taking short walks, and doing puzzles, when in truth and in fact, as **ELIZABETH EUER**, then well knew, that her activities also consisted of the operation of her business, Bounce Back Sports LLC, and selling items at flea markets prior to January 1, 2010.

In violation of Title 18, United States Code, Section 1001.

COUNTS THREE THROUGH FIVE

The Grand Jury further charges that:

On or about the dates listed below, within the Eastern District of Missouri, the defendant,

ELIZABETH EUER,

did embezzle, steal, purloin, or knowingly convert to her use money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: government funds in the amounts listed below:

| <u>COUNT</u> | <u>DATE</u> | <u>AMOUNT</u> |
|--------------|------------------|---------------|
| 3 | November 3, 2011 | \$1,264.00 |
| 4 | December 2, 2011 | \$1,264.00 |
| 5 | December 3, 2012 | \$1,309.00 |

All in violation of Title 18, United States Code, Section 641.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
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Assistant United States Attorney